

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

**Plaintiff: Joanna Ardalan, Esq., and One LLP,**

**v.**

**Defendants: [Hamza Khan & Abdullah Khan /BinoTech LLC, HikTech LLC & Abdullah Limited Company],**

Case No. Civil Action No. 8:23-cv-01243-K.K-(DFMx)

---

**ANSWER TO COMPLAINT**

**Defendants [Hamza Khan principal of BinoTech LLC and HikTech LLC & Abdullah Khan principals of Abdullah Limited Company],** as pro se representing themselves, here by answers the Complaint of Plaintiff Joanna Ardalan, Esq., and One LLP as follows:

---

**General Denial**

Defendant denies each and every allegation, statement, and claim contained in the Complaint unless specifically admitted in this Answer. Defendants are not involved in the business practice that is mentioned in alleged complaints.

---

**First Cause of Action: Infringement of the Right of Publicity (Common Law and Cal. Civil Code § 3344)**

Defendant denies the allegations in **Paragraph 44, 45, 46, 47, and 48** of the Complaint and further denies the allegations referenced from preceding paragraphs.

---

**Second Cause of Action: Unfair Competition Under California Business And Professions Code §§ 17200 et seq.**

Defendant denies the allegations in **Paragraph 49, 50, 51, 52, 53, 54, and 55** and denies all referenced prior paragraphs.

---

**Third Cause of Action: Unfair Competition Under California Common Law**

Defendant denies the allegations in **Paragraph 56, 57, 58, 59, and 60** and denies all referenced prior paragraphs.

---

**Fourth Cause of Action: Trademark Infringement Under 15 U.S.C. § 1114**

Defendant denies the allegations in **Paragraph 61, 62, 63, 64, 65, 66, 67, 68, 69, and 70** and denies all referenced prior paragraphs.

---

**Fifth Cause of Action: Trademark Counterfeiting Under 15 U.S.C. § 1116**

Defendant denies the allegations in **Paragraph 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, and 81** and denies all referenced prior paragraphs.

---

**Sixth Cause of Action: False Designation of Origin/Unfair Competition Under 15 U.S.C. § 1125(a)**

Defendant denies the allegations in **Paragraph 82, 83, 84, 85, 86, 87, and 88** and denies all referenced prior paragraphs.

**Prayer for Relief**

Wherefore, Defendant respectfully requests that the Court:

1. Remove BinoTech LLC, HikTech LLC & Abdullah limited company from this complaint.

**General Statements from the Defendants:**

Hiktech LLC, BinoTech LLC, and Abdullah Company Limited are legal entities formed in the State of Pennsylvania and are not associated with any parties that are mentioned in the complaint above. Any individual or entity other than Hamza Khan principals of Hiktech LLC, BinoTech LLC, and Abdullah Khan principal of Abdullah Company Limited claiming to be associated with address 2172 Lucy Lane, York, Pa mentioned in complaint are false. The Defendants believe their address and information has been stolen and are being used without their consent or approval. Hamza Khan principals of Hiktech LLC, BinoTech LLC, and Abdullah Khan principal of Abdullah Company Limited has met with plaintiff via video conference and provided legal documents that are submitted to State of Pennsylvania for the formation Hiktech LLC, BinoTech LLC, and Abdullah Company Limited. The documents are also attached in the submission, as well as identity proof of both individual Hamza Khan and Abdullah Khan and their address.

BinoTech LLC, HikTech LLC & Abdullah Limited Company are small businesses and are not in the business that has been mentioned in the complaint. We believe we have been included in this complaint as a mistake and are trying to cooperate with the plaintiff in order to rectify this. Hamza Khan is a marketing professional working 40 hours a week and cannot afford the cost of this lawsuit and has no final resources to secure the legal help. Abdullah Khan is a full time student at Penn State and cannot afford to hire a legal help. We believe the court can provide us with relief in this matter.



---

Hamza Khan / Principal of Bino Tech LLC and HikTech LLC



---

Abdullah Khan / Principal of Abdullah Limited Company

**Pennsylvania**  
visitPA.com USA

**DRIVER'S LICENSE**

**NOT FOR REAL ID PURPOSES**

DLN: 33 541 452  
DOB: 04/26/2003  
DUPS: 00


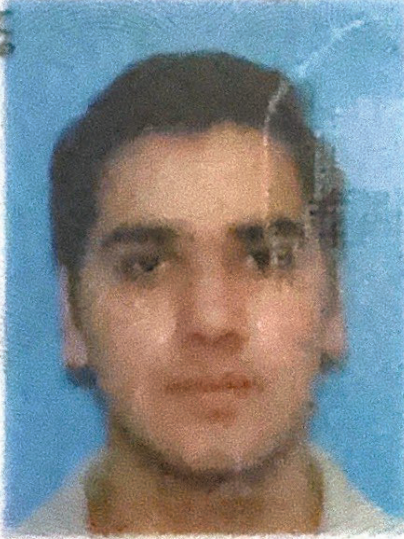
1 KHAN  
2 ABDULLAH IMRAN  
3 2172 LUCY LN  
4 YORK, PA 17404

4a EXP: 04/27/2028  
4a ISS: 04/26/2024  
5a SEX: M 1a EYES: BRO  
1a HGT: 5'-11"  
9 CLASS: C  
9a END: NONE  
12 RESTR: 1

DD: 2411701502301  
400000061060

**DL**

**ORGAN DONOR**



*Signature*



**Pennsylvania**  
visitPA.com USA

**DRIVER'S LICENSE**

NOT FOR REAL ID PURPOSES

DUPS: 01

022



1 KHAN  
2 HAMZA IMRAN  
3 DOB: 10/14/1997  
4 DLN: 31 588 900  
5 2172 LUCY LN  
6 YORK, PA 17404

4b EXP: 10/15/2027  
4a ISS: 12/29/2023  
15 SEX: M 18 EYES: BRO  
16 HGT: 6'-00"  
9 CLASS: C  
9a END: NONE  
12 RESTR: NONE



5 DD: 2336301101602  
8000000053347



# Articles of Organization

---

A set of formal documents filed with the Secretary of State to legally document the creation of a new business entity.





**Pennsylvania Department of State**  
Bureau of Corporations and Charitable Organizations  
PO Box 8722 | Harrisburg, PA 17105-8722  
T: 717.787.1057  
[dos.pa.gov/BusinessCharities](https://dos.pa.gov/BusinessCharities)

---

December 29, 2023

ABDULLAH LIMITED COMPANY  
2172 LUCY LN  
YORK, PA 17404

<b>Entity Name:</b>	ABDULLAH LIMITED COMPANY
<b>Entity File Date:</b>	December 26, 2023
<b>Entity Number:</b>	0013689006
<b>Filing Type:</b>	Domestic Limited Liability Company

The Bureau of Corporations and Charitable Organizations is happy to send your filed document. The Bureau is here to serve you and we would like to thank you for doing business in Pennsylvania.

Thank you for registering with the Department of State to do business in Pennsylvania. Like many other businesses, you may have employees, sell taxable products, or provide a taxable service to consumers in Pennsylvania. Please visit [www.pa100.state.pa.us](http://www.pa100.state.pa.us) to register for business taxes with the Department of Revenue and the Department of Labor and Industry. You may also visit [www.Business.pa.gov](http://www.Business.pa.gov) to find resources for businesses through all stages of development.

Beginning in 2025, annual reports are required for all domestic filing entities, limited liability general partnerships and registered foreign associations. More information will be forthcoming from the Bureau. However, to ensure that you receive notice of how and when to make annual reports, keep all information on file with the Bureau up-to-date, particularly registered office address.

**COMMONWEALTH OF PENNSYLVANIA**

Department of State

Bureau of Corporations and Charitable Organizations

PO Box 8722

Harrisburg, Pennsylvania 17105-8722

**CERTIFICATE OF ORGANIZATION -  
LIMITED LIABILITY COMPANY**

Fee: \$125

Pennsylvania Department of State

**-FILED-**

File #: 0013689006

Date Filed: 12/26/2023

**DSCB:15-8821 (rev. 2/2017)**

In compliance with the requirements of [15 Pa.C.S. § 8821](#) relating to certificate of organization), the undersigned desiring to organize a limited liability company, hereby certifies that:

Limited Liability Company Type

Filing type

Domestic Limited Liability Company

Limited liability company subtype

Limited Liability Company

Limited Liability Company Name

Entity name

ABDULLAH LIMITED COMPANY

Effective Date

The filing shall be effective when filed with the Department of State

Registered Office

The address of this limited liability company's proposed registered office in this Commonwealth is

2172 LUCY LN

YORK, PA 17404

YORK

Organizers

Name of individual or organization	Address
ABDULLAH KHAN	2172 LUCY LN YORK, PA 17404

Additional provisions, if any

Additional provisions



I qualify for a veteran/reservist-owned small business fee exemption (see help)

Electronic Signature

IN TESTIMONY WHEREOF, the organizer(s) has (have) executed this Certificate of Organization.

ABDULLAH KHAN12/26/2023

ABDULLAH KHAN

Date



**PENNSYLVANIA DEPARTMENT OF STATE**  
**BUREAU OF CORPORATIONS AND CHARITABLE ORGANIZATIONS**
☐ Return document by mail to:

CESAR A MUNOZ

Name

306 W MARKET,

Address

YORK174

PA

17401

City

State

Zip Code

☐ Return document by email to:

**Certificate of Organization Domestic  
Limited Liability Company**

DSCB:15-8821(rev. 2/2017)



8821

 Read all instructions prior to completing. This form may be submitted online at <https://www.corporations.pa.gov/>.
**Fee: \$125.00**
☐ I qualify for a veteran/reservist-owned small business fee exemption (see instructions)

In compliance with the requirements of 15 Pa.C.S. § 8821 (relating to certificate of organization), the undersigned desiring to organize a limited liability company, hereby certifies that:

1. The name of the limited liability company (designator is required, i.e., "company", "limited" or "limited liability company" or abbreviation):

Binotech LLC

2. Complete part (a) or (b) – not both:

(a) The address of the limited liability company's initial registered office in this Commonwealth is:

(post office box alone is not acceptable)

2172 Lucy Lane

YORK

PA

17404

York

Number and Street

City

State

Zip

County

(b) name of its commercial registered office provider and the county of venue is:

c/o:

Name of Commercial Registered Office Provider

County

3. The name of each organizer is (all organizers must sign on page 2):

Name

Address

Hamza khan

2172 Lucy Lane , YORK , York , PA , United States ,  
17404

4. Effective date of Certificate of Organization (check, and if appropriate complete, one of the following):

☒ The Certification of organization shall be effective upon filing in the Dept of State.

☐ The Certification of organization shall be effective  
on:

at

Date(MM/DD/YYYY)

Hour (if any)

**5. Restricted professional companies only.**

*Check the box if the limited liability company is organized to render a restricted professional service and check the type of restricted professional service(s).*

☐ **The company is a restricted professional company organized to render the following restricted professional service(s):**

☐ Chiropractic

☐ Dentistry

☐ Law

☐ Medicine and surgery

☐ Optometry

☐ Osteopathic medicine and surgery

☐ Podiatric medicine

☐ Public accounting

☐ Psychology

☐ Veterinary medicine

**6. Benefit companies only.**

*Check the box immediately below if the limited liability company is organized as a benefit company:*

☐ **This limited liability company shall have the purpose of creating general public benefit**

*Optional specific public benefit purpose. Check the box immediately below if the benefit company is organized to have one or more specific public benefits and supply the specific public benefit(s).  
See instructions for examples of specific public benefit.*

☐ **This limited liability company shall have the purpose of creating the enumerated specific public benefit(s):**

---

---

---

**7. For additional provisions of the certificate, if any, attach an 8½ x 11 sheet.**

IN TESTIMONY WHEREOF, the organizer(s) has (have) signed this Certificate of Organization this 11 day of May, 2021.

**Hamza khan**

\_\_\_\_\_  
Signature

**PENNSYLVANIA DEPARTMENT OF STATE  
BUREAU OF CORPORATIONS AND CHARITABLE ORGANIZATIONS**
☐ Return document by mail to:

CESAR A MUNOZ

Name

306 W MARKET,

Address

YORK174

PA

17401

City

State

Zip Code

☐ Return document by email to:

**Certificate of Organization Domestic  
Limited Liability Company**

DSCB:15-8821(rev. 2/2017)



8821

 Read all instructions prior to completing. This form may be submitted online at <https://www.corporations.pa.gov/>.

**Fee: \$125.00**
☐ I qualify for a veteran/reservist-owned small business fee exemption (see instructions)

In compliance with the requirements of 15 Pa.C.S. § 8821 (relating to certificate of organization), the undersigned desiring to organize a limited liability company, hereby certifies that:

1. The name of the limited liability company (designator is required, i.e., "company", "limited" or "limited liability company" or abbreviation):

HIK Tech LLC

2. Complete part (a) or (b) – not both:

(a) The address of the limited liability company's initial registered office in this Commonwealth is:

(post office box alone is not acceptable)

2172 LUCY LN

YORK

PA

17402

York

Number and Street

City

State

Zip

County

(b) name of its commercial registered office provider and the county of venue is:

c/o:

Name of Commercial Registered Office Provider

County

3. The name of each organizer is (all organizers must sign on page 2):

Name

Address

HAMZA KHAN

2172 LUCY LN , YORK , York , PA , United States ,  
17402

4. Effective date of Certificate of Organization (check, and if appropriate complete, one of the following):

☒ The Certification of organization shall be effective upon filing in the Dept of State.

☐ The Certification of organization shall be effective  
on:

at

Date(MM/DD/YYYY)

Hour (if any)

**5. Restricted professional companies only.**

*Check the box if the limited liability company is organized to render a restricted professional service and check the type of restricted professional service(s).*

☐ **The company is a restricted professional company organized to render the following restricted professional service(s):**

☐ Chiropractic

☐ Dentistry

☐ Law

☐ Medicine and surgery

☐ Optometry

☐ Osteopathic medicine and surgery

☐ Podiatric medicine

☐ Public accounting

☐ Psychology

☐ Veterinary medicine

**6. Benefit companies only.**

*Check the box immediately below if the limited liability company is organized as a benefit company:*

☐ **This limited liability company shall have the purpose of creating general public benefit**

*Optional specific public benefit purpose. Check the box immediately below if the benefit company is organized to have one or more specific public benefits and supply the specific public benefit(s).  
See instructions for examples of specific public benefit.*

☐ **This limited liability company shall have the purpose of creating the enumerated specific public benefit(s):**

---

---

---

**7. For additional provisions of the certificate, if any, attach an 8½ x 11 sheet.**

IN TESTIMONY WHEREOF, the organizer(s) has (have) signed this Certificate of Organization this 16 day of August, 2022.

**HAMZA KHAN**

\_\_\_\_\_  
Signature